

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE: Sahar Zamir,)	CHAPTER 7
)	
Debtor.)	CASE NO. 19-63015-jwc
)	
)	
Sahar Zamir,)	
)	
Movant,)	CONTESTED MATTER
)	
v.)	
)	
David Wasserman,)	
)	
)	
Respondent.)	

RESPONSE TO MOTION TO AVOID LIEN

COMES NOW, David Wasserman, and files this, his Response to Debtor's Motion to Avoid Lien, and in support thereof, states as follows:

1. On October 2, 2019, Debtor filed a Motion to Avoid the non-possessory, non-purchase money security interest in certain household goods, wearing apparel, appliances, books, and musical instruments of the Debtor.
2. Mr. Wasserman has a security interest in one engagement ring (the "Engagement Ring") worth approximately \$29,000.00 and one wedding band (the "Wedding Ring," collectively, with the Engagement Ring, the "Rings") worth approximately \$3,000.00. Mr. Wasserman is also in possession of these items of jewelry and has a lien that specifically attaches to both items.

3. The items are worth more than \$300.00, and Mr. Wasserman has a possessory security interest in the Collateral; therefore, Ms. Samir cannot avoid the lien. Moreover, she did not exempt or schedule any interest in the Ring in her schedules.

WHEREFORE, Mr. Wasserman prays that this Court deny the Motion and enter an Order providing that Mr. Wasserman's lien as to the Rings is NOT avoided and to set this matter for a hearing and for such other and further relief as this Court deems appropriate.

/s/ Will B. Geer
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